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Christopher Terry, and Isis Terry

13
 14 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

15 FEDERAL TRADE COMMISSION; and
 16 STATE OF NEVADA,
 17 Plaintiffs
 v.
 18 INTERNATIONAL MARKETS LIVE INC.,
 a corporation, also d/b/a IYOVIA,
 19 iMarketsLive, IM Mastery Academy, and IM
 Academy; IM MASTERY ACADEMY
 20 LTD., f/k/a International Markets Live Ltd., a
 United Kingdom company; ASSIDUOUS,
 21 INC., a corporation; GLOBAL DYNASTY
 NETWORK, LLC., a limited liability
 22 company; CHRISTOPHER TERRY,
 individually and as an owner and officer of
 23 International Markets Live Inc.; ISIS
 TERRY, fka ISIS DE LA TORRE,
 individually and as an owner and officer of
 24 International Markets Live Inc., IM Mastery
 Academy Ltd., and Assiduous, Inc.; JASON
 25 BROWN, individually and as an officer of
 International Markets Live Inc. and as a
 member of Global Dynasty Network, LLC;
 26 ALEX MORTON, individually and as an
 officer of International Markets Live Inc.;
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28
 Case No.: 2:25-cv-00760-CDS-NJK
STIPULATION AND ORDER
EXTENDING DEADLINE TO RESPOND
AND REPLY TO MOTION FOR
PRELIMINARY INJUNCTION
(FIRST REQUEST)

[ECF No. 47]

1 MATTHEW ROSA, individually and as a
 2 member of Global Dynasty Network, LLC;
 3 and BRANDON BOYD,

3 Defendants

4 Plaintiffs FEDERAL TRADE COMMISSION and STATE OF NEVADA (collectively,
 5 as the “Plaintiffs”) and Defendants INTERNATIONAL MARKETS LIVE INC., IM
 6 MASTERY ACADEMY LTD., ASSIDUOUS, INC., CHRISTOPHER TERRY, and ISIS TERRY,
 7 together with Defendants GLOBAL DYNASTY NETWORK, LLC, JASON BROWN,
 8 ALEX MORTON, MATTHEW ROSA, and BRANDON BOYD (collectively, as the
 9 “Defendants”) (Plaintiffs and Defendants collectively as the “Parties” and each a “Party”), by
 10 and through their respective undersigned counsel of record, hereby respectfully submit this
 11 *Stipulation and Order Extending Deadline to Respond and Reply to Motion for Preliminary*
 12 *Injunction* (the “Stipulation”) and stipulate and agree to a fourteen (14)-day extension of the
 13 current response deadline (from June 13, 2025 to June 27, 2025) with a corresponding seven
 14 (7)-day extension to the reply deadline for Plaintiffs’ *Motion for Preliminary Injunction*, dated
 15 May 30, 2025 (the “Motion”; ECF No. 42), which is the first requested extension thereto, as
 16 follows:

17 1. On May 30, 2025, Plaintiffs filed their *Motion for Preliminary Injunction* (the
 18 “Motion”; ECF No. 42).

19 2. Responses to the Motion are currently due by June 13, 2025, thereby making
 20 replies due by June 20, 2025.

21 3. Plaintiffs’ Motion seeks a preliminary injunction against the four corporate
 22 defendants¹ and the six individually named defendants² “that enjoins Defendants’ unlawful
 23 conduct, preserves Defendants’ assets, and appoints a monitor over Corporate Defendants, which
 24 have operated as a common enterprise” (ECF No. 42 at 10), and is accompanied by a seven-part

25 ¹ (ECF No. 42-1 at 5) (“**Corporate Defendants**” means International Markets Live, Inc., also d/b/a
 26 IYOVIA, iMarketsLive, IM Mastery Academy, and IM Academy; IM Mastery Academy Ltd., f/k/a
 27 International Markets Live Ltd.; Assiduous, Inc., Global Dynasty Network, LLC, and their
 affiliates, subsidiaries, successors and assigns.”).

28 ² (ECF No. 42-1 at 6) (“**Individual Defendants**” means Christopher Terry, a/k/a Chris Terry, Isis
 Terry, f/k/a Isis De La Torre, Jason Brown, Alex Morton, Matthew Rosa, and Brandon Boyd.”).

1 proposed preliminary injunction (ECF No. 42-1–42-7) and 25 exhibits, totaling 6928 pages (ECF
 2 No. 42-8–42-48) and including 12 videos (ECF No. 43).

3 4. Defendants' good faith estimate is that a minimum 90-day extension to the
 4 response deadline is reasonably necessary to fully respond to Plaintiffs' Motion given the nature of
 5 Motion, the scope and broad/far reaching extent of the injunctive relief sought, and the sheer volume
 6 of the exhibits—which includes a 564-page expert report (ECF No. 42-23). Briefing on a motion
 7 for preliminary injunction inherently necessitates a “sneak peak” of the allegations and claims
 8 asserted in the complaint on the merits—which, here, involves a 70-page Complaint alleging ten
 9 (10) counts against four (4) corporate defendants and six (6) individual defendants based on the
 10 Federal Trade Commission Act, Telemarketing and Consumer Fraud and Abuse Prevention Act,
 11 and the Restore Online Shoppers' Confidence Act, as well as NRS Chapter 598. Further,
 12 Defendants will need adequate time to obtain and present sufficient evidentiary support to rebut not
 13 only the 564-page expert report, but the various statements and assertions made by 20 declarants,
 14 which include a forensic accountant and a data analyst.

15 5. The Parties have exchanged their respective views and positions on the time and
 16 effort reasonably necessary to respond and reply to the Motion, but had fundamentally differing
 17 opinions.

18 6. As a result, the Parties agreed to a compromise whereby the response deadline
 19 would be extended fourteen (14) days (June 13, 2025 to June 27, 2025), along with a corresponding
 20 seven (7)-day extension to the reply deadline to July 11, 2025), and further extension would be
 21 sought by motion on a shortened briefing schedule.

22 7. Accordingly, the Parties hereby agree and stipulate, and jointly move for entry of
 23 an order so approving, as follows:

- 24 a. The current deadline to file responses to the Motion (ECF No. 42) is extended
 25 fourteen (14) days, from June 13, 2025 to **June 27, 2025**.
- 26 b. The reply deadline will be extended a corresponding seven (7) days, to **July
 27 11, 2025**.
- 28 c. A shortened briefing schedule will govern any subsequent motions to extend

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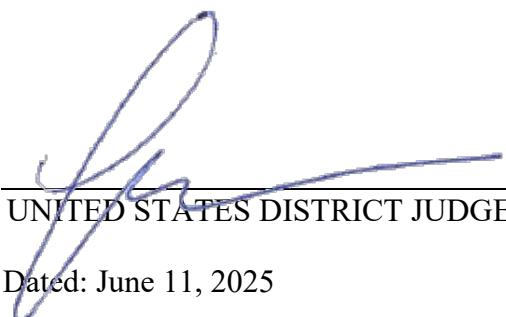
5 *Attorneys for Brandon Boyd*

6 *Federal Trade Commission et al. v. International Markets Live, Inc. et al.*

7 Case No. 2:25-cv-00760-CDS-NJK

8 Order Extending Deadline to Respond and Reply to Motion for Preliminary Injunction (First Request)

9 **IT IS SO ORDERED:**

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12 **UNITED STATES DISTRICT JUDGE**

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14 Dated: June 11, 2025

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